

IDS and the Form PTO/SB/08A/B for the Examiner's convenience. Applicants respectfully request that the Examiner consider the references cited therein, copies of which were provided to the Patent Office, if they have not been considered already, and enter a copy of the signed and initialed Form PTO/SB/08A/B in the application file, and return a signed and initialed copy along with the next communication from the Patent Office.

Claims 1-23 and 25-42 remain in the present application, of which claims 1, 7-8, 21-23, 27-28 and 40-41 are independent. None of the claims has been amended herein. Applicants appreciate the allowance of claims 7, 8, 21, 22, 27, 28, 40 and 41. Applicants also appreciate the indication that claim 42 is objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants respectfully request reconsideration, reexamination and allowance of claims 1-6, 9-20, 23, 25-26 and 29-39. Applicants also respectfully request that the allowance of claims 7, 8, 21, 22, 27, 28, 40 and 41 as well as the indication that claim 42 has allowable subject matter be maintained.

The Examiner has rejected claims 1, 6, 12 and 17-18 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,133,901 ("Law"). The Examiner has also rejected claims 2-5 and 25 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Law, and further in view of Foley et al. (Computer Graphics: Principles and Practice). Further, the Examiner has rejected claims 9-11, 13-16, 19-20, 23, 26 and 29-39 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Law.¹

¹ Here, the Examiner refers to U.S. Patent No. 6,038,031 as Law. However, U.S. Patent No. 6,038,031 is "3D Graphics Object Copying with Reduced Edge Artifacts" issued to Murphy. From the context of the Examiner's remarks, applicants assume that the Examiner intended to indicate U.S. Patent No. 6,133,901, issued to Law.

The Examiner states that Law discloses "filtering the graphical element with a low pass filter to generate a multi-level value per pixel at an intended final display resolution," and cites col. 3, lines 43-45 of Law. The Examiner also states that Law discloses "using the multi-level values as alpha blend values for the graphical element in a subsequent compositing stage," and cites col. 3, lines 53-60 of Law. Applicants respectfully traverse as follows.

Col. 3, lines 43-47 of Law recites "[t]he graphics computer system calculates the samples of the integral of the impulse response of a low pass filter. A plurality of values representative of the integral of the impulse response are stored in a look-up table and form a filter profile." Applicants respectfully submit that an impulse response is generally defined as "an output waveform that results when the input is excited by a unit impulse," where the unit impulse is defined as "an impulse of infinite amplitude and zero width." Hence, the samples of the integral of the impulse response has to do with a filter profile and should not be equated with a multi-level value per pixel generated by filtering the graphical element with a low pass filter.

In fact, Law appears to teach against such filtering of graphical element on col. 2, lines 36-55 as follows, "[t]he problem with the above look-up table method is the fact that the values stored in the table are very much dependent upon the characteristics of the primitive. *The look-up table stores the actual profile of a filtered primitive. . .* The problem with this method, however, is that if the width or position of the line primitives or the size of the point primitives changes, the antialiasing performance of this conventional look-up table deteriorates." (*emphasis added*). Since Law specifically teaches against storing the actual profile of a filtered primitive, and teaches instead to store integral of the impulse response, applicants respectfully submit that Law does not disclose "filtering

the graphical element with a low pass filter to generate a multi-level value per pixel at an intended final display resolution."

As to col. 3, lines 53-60 of Law cited by the Examiner, this passage recites, in a relevant portion, "[t]he upper and lower limits are used to index the look-up table and return an upper limit value (alpha) and a lower limit alpha. These *alphas correspond to samples of the integral of the filter profile.*" (*emphasis added*). Applicants respectfully submit that "the samples of the integral of the filter profile" are not the same as the multi-level values generated by "filtering the graphical element with a low pass filter to generate a multi-level value per pixel at an intended final display resolution" as discussed above.

Claim 1 recites, in a relevant portion, "filtering the graphical element with a low pass filter to generate a multi-level value per pixel at an intended final display resolution; and using the multi-level values as alpha blend values for the graphical element in a subsequent compositing stage, wherein generation of the multi-level values do not depend on alpha blend values that existed prior to filtering." Since Law does not disclose this, Law does not anticipate claim 1. Therefore, applicants respectfully request that the rejection of claim 1 be withdrawn and that claim 1 be allowed.

Since claims 2-6, 9-20 and 42 depend, directly or indirectly, from claim 1, they incorporate all the terms and limitations of claim 1 in addition to other limitations, which together further patentably distinguish them over the cited references. Therefore, applicants respectfully request that the rejection of claims 2-6, 9-20 and 42 be withdrawn and that they be allowed.

Claim 23 recites, in a relevant portion, "a low pass filter for filtering the graphical element to generate multi-level values, one multi-level value per each pixel, at an intended final display resolution; a display buffer for storing the multi-level values; and a display engine for compositing the graphical element with at least

one graphics image using the multi-level values as alpha blend values, wherein generation of the multi-level values do not depend on alpha blend values that existed prior to filtering." Since Law does not teach or suggest this, claim 23 is not unpatentable over Law. Therefore, applicants respectfully request that the rejection of claim 23 be withdrawn and that claim 23 be allowed.

Since claims 25, 26 and 29-39 depend, directly or indirectly, from claim 23, they incorporate all the terms and limitations of claim 23 in addition to other limitations, which together further patentably distinguish them over the cited references. Therefore, applicants respectfully request that the rejection of claims 25, 26 and 29-39 be withdrawn and that they be allowed.

In view of the foregoing amendments and remarks, applicants respectfully request that claims 1-6, 9-20, 23, 25, 26 and 29-39 in addition to the already allowed claims 7, 8, 21, 22, 27, 28, 40, 41 and the allowable claim 42. If there are any remaining issues that can be addressed over the telephone, the Examiner is invited to call applicants' attorney at the number listed below.

Respectfully submitted,

CHRISTIE, PARKER & HALE, LLP

By Jun E. Jeon
Jun-Young E. Jeon
Reg. No. 43,693
626/795-9900

JEJ/sd